

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NAUTILUS INSURANCE COMPANY,

Plaintiff,

V.

GAWKER MEDIA, LLC AKA GAWKER)
 MEDIA; GAWKER MEDIA GROUP, INC. AKA)
 GAWKER MEDIA; GAWKER TECHNOLOGY,)
 LLC; GAWKER SALES, LLC; NICK DENTON;)
 A.J. DAULERIO; KATE BENNERT; BLOGWIRE)
 HUNGARY SZELLEMI ALKOTAST)
 HASZNOSITO KFT AKA GAWKER MEDIA;)
 TERRY BOLLEA,)

Defendants.

Civil Action No. 14-CV-5680 (SHS)

**DECLARATION OF
JARED ZOLA, ESQ.**

I, Jared Zola, Esq., pursuant to 28 U.S.C. § 1746, declare under penalty of perjury, and under the laws of the United States of America, that the foregoing is true based on my own personal knowledge:

1. I am a partner in the law firm Dickstein Shapiro LLP, counsel for Defendant Gawker Media, LLC (“Gawker”) in the above-captioned action.
2. I respectfully submit this declaration in support of Gawker’s Cross-Motion for Partial Summary Judgment and in opposition to Plaintiff Nautilus Insurance Company’s (“Nautilus”) Motion for Summary Judgment.
3. I am familiar with the facts and circumstances of this action by virtue of my personal involvement in this matter and review of the case files and believe that the information provided herein is true and correct to the best of my knowledge.
4. Attached as Exhibit A is a true and correct copy of communications between

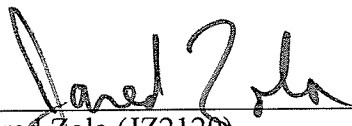
Gawker and Nautilus, dated November 4, 2013 and November 7, 2013.

5. Attached as Exhibit B is a true and correct copy of an Insurance Services Office, Inc. ("ISO") endorsement, form no. CG 21 44 07 98, entitled "Limitation of Coverage to Designated Premises or Project."

6. Attached as Exhibit C is a true and correct copy of the International Risk Management Institute, Inc.'s ("IRMI") discussion of ISO Exclusion "o" from its *CGL and Umbrella Insurance Guide* (updated November 2013).

Dated: New York, New York
November 13, 2014

By:



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*Attorneys for Defendant
Gawker Media, LLC*